

REPLY

EXHIBIT 20

John Doe 1, et al. v. University of San Francisco, et al.

Case No. 3:22-cv-01559-LB

Supplemental Expert Report of Robert Boland, J.D.

February 6, 2025

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I. INTRODUCTION

1. In light of evidence that has been produced since I provided my initial report on November 21, 2024, I have been asked by Plaintiffs' counsel to provide a supplemental expert report in the matter of *John Doe 1, et al. v. University of San Francisco, Anthony N. (aka Nino) Giarratano, Troy Nakamura*, No. 3:22-cv-01559-LB (N.D. Cal.). I refer to University of San Francisco as "USF," and Anthony N. Giarratano and Troy Nakamura as the "Coach Defendants" or "Coaches." I understand that a substantial amount of this evidence comes from the arbitration between Giarratano and USF, including testimony from many key figures such as the USF's President Father Paul Fitzgerald, Athletics Director Joan McDermott, and Giarratano himself.

II. QUALIFICATIONS AND EXPERIENCE

2. My qualifications, experience, and rate of compensation are provided in my November 21, 2024 Report and have not materially changed.

III. ASSIGNMENT

3. Counsel for Plaintiffs requested that I provide my supplemental opinions, informed by newly produced evidence and based on my experience and knowledge, on the following questions:

(a) How does newly produced evidence inform the opinions I gave in my initial report, if at all, including with respect to:

(i) how USF exercises control and oversight over its coaches, particularly concerning sexual communications, sexual conduct, and grooming and hazing behaviors directed at student-athletes; and

(ii) what policies and practices USF had in place to address the risk of sexual communications, sexual conduct, and grooming and hazing behaviors directed at student-athletes; and

(iii) what ways USF's actions, or lack thereof, contributed to creating a culture that heightens the risk of sexual communications, sexual conduct, grooming and hazing behaviors by coaches, how that culture impacted the safety

and well-being of student-athletes, and how USF failed properly to oversee its coaches or respond to evidence of abuse.

(b) How does newly produced evidence inform the opinions I gave in my initial report, if at all, regarding the power imbalance between NCAA coaches and student-athletes, the Coach Defendants' grooming and hazing behaviors, and the normalization of an abusive culture on the USF baseball team.

IV. SUMMARY OF OPINIONS

4. My opinions are based on my extensive experience in collegiate athletics and my expertise as an attorney and academic specializing in this field. In forming these opinions, I have reviewed materials provided in this litigation as listed in Appendix 2 of my November 21 Report as well as the additional, newly produced materials listed in Appendix 3, and supplemented them with my own knowledge and research. It is important to note that some requested materials were not provided during discovery, and my opinions are subject to change should additional information become available. Having reviewed the available materials in this case within the framework of the research and literature on athletic governance and best practices and based on my experience in and scholarship about intercollegiate athletics, I offer the following opinions:

5. **Structural Failings Within USF's Administration Reinforced and Compounded the Culture of Abuse:** Newly produced evidence reflects a near total absence of essential administrative oversight of USF's athletics program, including an inadequate reporting structure, inadequate staffing of the Athletics Department, inadequate supervision by the President, Athletics Director, and other senior leadership, and a lack of discipline for egregious misconduct. Coupled with USF's lack of appropriate policies and trainings, addressed in my initial report, USF's structural failings created a near perfect storm that allowed a culture of abuse to persist and thrive unchecked for decades.

6. **The Coaches, and Now USF, Exploited the Culture of Abuse to Normalize Misconduct, Silence Dissent, and Coerce Support:** The Coaches, and now USF, have exploited the culture of abuse to normalize the Coaches' misconduct, silence dissent, and coerce support. Newly produced evidence reflects that university leaders [REDACTED]

[REDACTED]

[REDACTED] In now pressing former players for declarations denying the Coaches' misconduct, USF is continuing that very culture of coercion and abuse that [REDACTED] had created and perpetuated the problems on the baseball team to begin with.

V. OPINIONS

A. Recently Produced Evidence Reflects Structural and Leadership Failings That Further Reinforced the Culture of Abuse that Existed Within USF's Baseball Team.

7. In my initial report, I discussed the substantial control USF exercises over its Coaches.¹ I discussed, for instance, how USF exercises institutional control over almost every aspect of a coach's job, "including what qualifications coaches must have to be able to work, what trainings they must complete, when coaches are allowed to work, when coaches can interact with the athletes in their charge, how coaches disseminate information from the NCAA to their staff, and when and how they can recruit new athletes."²

8. I concluded that, given this substantial level of control, and the rules that other sports entities have put in place to address sexual misconduct (e.g., The U.S. Olympic Committee and SafeSport), it was "remarkable that USF has no rules expressly prohibiting any form of sexual communication or sexual conduct between coaches and student-athletes, mandating training related to the power dynamic between coaches and student-athletes and to the inability of student-athletes to consent to any form of sexual communication or sexual conduct with their coaches, and appropriate team environments free from any form of sexual communication or sexual conduct between coaches and student-athletes."³ This failing was compounded by USF's failure to educate, train, or warn student-athletes about power dynamics between coaches and student-athletes, and the commensurate risk of sexual misconduct by coaches.⁴ This, along with USF's trivialization of the Coaches' conduct and student-athletes'

¹ Boland Nov. 21, 2024 Report ¶¶ 54-62.

² *Id.* ¶ 55.

³ *Id.* ¶ 58.

⁴ *Id.* ¶¶ 63-82.

reactions, “perpetuated a culture in which abusive behavior by coaches could continue unchecked.”⁵

9. New evidence demonstrates that not only were USF’s policies and trainings inadequate, but the entire structure of its Athletic Department and administration all but ensured that misconduct was not identified, reported, or prevented. This further compounded the culture of abuse.

10. On March 30, 2022, several weeks after this lawsuit was filed, USF’s President Paul Fitzgerald emailed the USF community and announced that USF would conduct an “external program review of athletics.”⁶ To conduct the review, in August 2023, USF retained Mitchell Malachowski, Faculty Athletic Representative, University of San Diego; (2) Ellen Ferris, Senior Associate Commissioner, American Athletic Conference; and (3) Bruce Rasmussen, Former Athletics Director, Creighton University.⁷ Surprisingly, given the nature of the conduct at issue and USF’s prior experience with sexual misconduct in its athletics program, none of these individuals appear to have specific experience or qualifications related to Title IX, SafeSport, sexual misconduct, student-athlete safety, grooming, hazing, or investigating or preventing other forms of abuse.

11. The team was “asked to review all aspects of the athletic programs at USF” with a particular emphasis on culture.⁸ The team spent only two days at USF.⁹ Despite lacking any specific background in Title IX, SafeSport, sexual misconduct, grooming, hazing and related issues, the team was able to identify major structural shortcomings within USF’s athletic program directly related to these areas. The team found that the Athletics Department remained “significantly understaffed” which likely contributed to USF’s failure to detect and prevent prior misconduct:

The USF Athletics department is significantly understaffed, and this was likely a contributing factor in the failure to detect, address or prevent the occurrence of

⁵ *Id.* ¶¶ 83-85.

⁶ PLS-USF-0064291.

⁷ USF Resp. to Interrog. 20, Doe 3’s First Set of Interrogatories.

⁸ FERRIS0000181 at 181.

⁹ FERRIS0000005.

some of the previous negative situations. Sufficient checks and balances in the departmental structure and staffing should be in place to ensure issues are identified and addressed before becoming a systemic problem. In speaking with the coaches and staff, it was clear that these checks and balances were not in place, and the oversight normally provided by sport administrators was lacking due to being understaffed and conflicts of interest that permitted undesired behavior to continue undetected or unchecked. Addressing the staffing issues will allow the department to be more proactive in these areas going forward.¹⁰

12. In addition, the team found that USF's reporting structure was an "outlier" and inadequate to ensure institutional control over the Athletics Department:

The reporting line for the Athletics Director should be revised to ensure institutional control and oversight of athletics. Per NCAA Bylaws 8.01.2 1 and 8.1.1 2, the institution's president is ultimately responsible for the administration of all aspects of the athletics program. Given the president is the final authority for the conduct of the athletics program, the director of athletics should have direct access and a direct report to the president, and the president always should be fully informed about the activities of the department. USF is an outlier at this time in not having this reporting structure.¹¹

13. It is notable that these basic structural failings continued to exist in August 2023, when the team conducted its investigation. This was well over a year after this lawsuit was filed, long after other notable instances of misconduct and abuse within USF's Athletics Department had occurred, and years after the cited NCAA Bylaws on the president's ultimate responsibility had been promulgated.¹²

14. Testimony that I have reviewed reflects that the team's findings were correct. The testimony reveals breakdowns in the basic functioning of the Athletics Department and the senior administration, including failures to identify problems, report misconduct, and appreciate the need to protect student-athletes.

15. For example, Human Resources Director Diane Nelson testified that [REDACTED]

[REDACTED]

[REDACTED]

¹⁰ FERRIS0000181 at 183.

¹¹ FERRIS0000181 at 184.

¹² See, e.g., Investigation Report Regarding Allegations of Sexual Misconduct Involving the University of San Francisco Men's Soccer Team, USF_0039959 (Not Confidential).

[REDACTED]

[REDACTED]

[REDACTED]¹⁴

16. Defendant Giarratano testified that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17. There is no indication that Giarratano was disciplined or even reported for [REDACTED] by the Title IX Coordinator or McDermott. USF's failure to address Giarratano's [REDACTED] reflects a gross failure of oversight. Any reasonable administrator would have understood that Giarratano was placing the University, and the student-athletes in his care, at extraordinary risk. In my experience, coaches, including a national championship winning coach at Penn State, have been terminated for less severe [REDACTED]

¹³ Arb. Tr. Vol. X at 2599:25-2601:3.

¹⁴ *Id.* 2601:8-2602:5, 2602:11-13.

¹⁵ Giarratano Dep. Tr. Vol. 1 at 250:5-6, 251:3-5, 255:13-18, 257:13-258:1, 259:18-260:3, 261:9-262:2 [REDACTED]

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.* at 262:10-24 [REDACTED]

¹⁹ *Id.*

18. McDermott testified that [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] In fact, NCAA Bylaw 8.3 mandates that Athletics Directors conduct exit interviews with student-athletes leaving a program. [REDACTED]
[REDACTED]

[REDACTED].²²

19. USF's President, Father Paul Fitzgerald, testified that [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]²³

20. The foregoing reflects a near total absence of necessary administrative oversight of USF's athletics program. And this lack of oversight appears to persist today, even in the face of a series of incidents (including on the baseball team, the men's soccer team, and the women's basketball team) that should have put the University on heightened alert and sparked drastic corrective action. These structural failings, coupled with the lack of adequate policies and trainings (discussed in my initial report), created a near perfect storm where the Coaches' sexual misconduct was allowed to continue unchecked for decades. It was entirely foreseeable that, in this environment, the Coaches would feel empowered to engage in their misconduct, and student-athletes would feel helpless to resist. In fact, they were helpless: they lacked meaningful oversight, protective policies, or guidance (in the form of trainings or otherwise) on how to identify and report inappropriate behavior. This, in turn, fueled a culture that normalized the

²⁰ McDermott Dep. Tr. Vol. 2 at 282:2-5 [REDACTED]
[REDACTED]

²¹ McDermott Dep. Tr. Vol. 1 at 103:17-104:5, 104:19-21 ([REDACTED]
[REDACTED]
[REDACTED]

²² *Id.*

²³ Arb. Tr. Vol. IX at 2384:9-17.

Coaches' abuse and silenced (almost) any dissent. Indeed, [REDACTED]

[REDACTED], further reinforcing for student-athletes the futility of resistance.

B. USF and the Coaches Exploited the Profound Power Imbalance in College Sports and the Culture of Abuse to Normalize Misconduct, Silence Dissent, and Coerce Support.

21. In my initial report, I discussed the power dynamic between coaches and student-athletes at NCAA institutions.²⁴ Outlining the myriad ways in which Coaches control the lives and futures of student-athletes, I described this power imbalance as “profound and pervasive,” and “inherently unequal,” rendering the “coach-athlete relationship—and the sports team environment—vulnerable to abuse.”²⁵ I found that the “extreme behavior of Assistant Coach Troy Nakamura and Head Coach Nino Giarratano,” which “occurred openly on university grounds, in full view of the entire baseball team,” “created a highly visible culture of abuse and harassment.”²⁶ The Coaches’ dismissive attitude towards the misconduct, including referring to it as harmless “locker room talk” intended to loosen up players resulted in its “casual normalization.”²⁷

22. Moreover, the Coaches permitted, and at times participated in, hazing and other coercive behaviors as a form of grooming, reinforcing a culture of fear and compliance, and conditioning student-athletes to accept mistreatment and not report (or even recognize) abuse.²⁸ For its part, USF failed to implement adequate anti-hazing measures, contributing to the overall climate of abuse, and leaving student-athletes vulnerable to both physical and sexual misconduct.²⁹

23. Newly produced evidence reinforces these conclusions. [REDACTED]

[REDACTED], it is

²⁴ Boland Nov. 21, 2024 Report ¶¶ 31-53.

²⁵ *Id.* ¶ 40.

²⁶ *Id.* ¶ 41.

²⁷ *Id.* ¶ 42.

²⁸ *Id.* ¶¶ 47-48.

²⁹ *Id.* ¶ 48.

clear that a culture of silence and coercion was normalized and pervaded USF's baseball team—and that it continues to impact former players to this day.

24. USF retained Sandy Barbour as an expert in its arbitration with Defendant Giarratano. Ms. Barbour served as Athletics Director at Penn State during its athletics department's reconstruction in the wake of the Sandusky scandal.^{30, 31}

25. Barbour testified about [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

³⁴

26. Critically, and consistent with my experience, Barbour explained that [REDACTED]

[REDACTED]

³⁰ Arb. Tr. VII at 1803:9-23.

³¹ I served as Athletics Integrity Officer through the final five of Ms. Barbour's eight years as Vice President of Athletics at Penn State. She would certainly have experience in an institution that had taken significant steps to address an institutional crisis that arose out of athletics.

My role was as the institution's chief compliance officer for athletics, overseeing principally Ms. Barbour's Department of Intercollegiate Athletics. In that role we worked closely together. I retain a high level of respect for Ms. Barbour professionally. She is a highly experienced and capable athletic administrator.

As the individual charged with overseeing that department for almost five years, some measure of friction is natural to have occurred, as I was charged with reviewing Ms. Barbour's decisions from an ethical lens and investigating her, her staff, coaches and athletes. I found Ms. Barbour to be a zealous defender of her coaches and her department but cognizant of larger ethical concerns even if we disagreed on approaches.

Since we departed Penn State, I have told Ms. Barbour that her tenure as athletic director was a significant one in ushering needed change at that institution.

³² Arb. Tr. Vol. VIII 1969:5-13.

³³ *Id.*

³⁴ *Id.* at 1969:22–1970:3.

██████.³⁵ In my experience, the collegiate athletic experience is an all-encompassing one, that affects an athlete's identity as well as representing a massive investment of time and effort and even after athletes are done competing they are protective of their reputations and those of their teams, coaches, and programs.

27. USF's President Father Paul Fitzgerald, Human Resources Director Diane Nelson, Athletics Director Joan McDermott, and Vice President Charles Cross all [REDACTED]

28. Fitzgerald noted

³⁶ Fitzgerald testified that

“³⁷ It was

Fitzgerald's

39

29. Human Resources Director Diane Nelson, who had investigated the Defendant Coaches in the wake of complaints by Does 1-3, found that [REDACTED]

⁴⁰ The message communicated to student-athletes on the baseball team was

41

30. Nelson also testified that

42

³⁵ *Id.* at 1970:5-9.

³⁶ Fitzgerald Dep. Tr. at 33:5-11; *id.* at 68:9-10

³⁷ *Id.* 78:4-11.

³⁸ *Id.* at 199:15-18.

³⁹ *Id.* at 152:18-19.

⁴⁰ Nelson Dep. Tr. 147:8-10.

⁴¹ *Id.*

⁴² Nelson Dep. Tr. 40:5-21 (

██████████.”⁴³ Despite Nelson’s knowledge, Giarratano’s wife does not appear to have been disciplined for ██████████.

31. McDermott, as Athletics Director, oversaw the baseball team and had direct access to players. McDermott confirmed that players were ██████████

██████████

██████████”⁴⁴ McDermott ██████████

██████████

██████████”⁴⁵

32. McDermott explained that ██████████

██████████

██████████.”⁴⁷ However, the player who emailed McDermott explained that the support letter should “be completely null and void” because “[w]e were completely coerced into signing it,” including receiving pressuring text messages and phone calls.⁴⁸

33. Vice President of Business and Finance Charles Cross similarly reported ██████████

██████████

██████████⁴⁹

34. I am aware that a number of former players submitted declarations with USF’s opposition to class certification referencing the team’s supposed support for Coach G after his termination and stating, for instance, that they had not endured sexual misconduct or other forms of abuse at the hands of the Coaches.

⁴³ *Id.*

⁴⁴ Arb. Tr. Vol. IX at 2218:13-15.

⁴⁵ Arb. Tr. Vol. XIII at 2102:25-2103:17.

⁴⁶ *Id.* at 2101:18-25 ██████████

⁴⁷ *Id.* at 2103:23-2104:2.

⁴⁸ USF_0115359 at 59.

⁴⁹ Cross Dep. Tr. 214:9-11.

35. In my experience, team dynamics commonly minimize or deny misconduct. This is common in ordinary matters and is amplified when the conduct involves hazing or sexual, taboo, or embarrassing matters.

36. In the course of nearly 60 investigations in collegiate or Olympic sports in which I have been involved in the last decade—whether at Penn State, as an independent reviewer, as a member of USA Weightlifting’s Ethics Committee, or as an attorney—I cannot recall a single matter where misconduct was found to have occurred where a witness or reporter did not receive some pressure from others on the team to either deny or conform their testimony to that of the group or coach or suffer either threat of being ostracized from the group or a physical threat.

37. The fact that a number of athletes walked that razor’s edge to stand firm in their reporting, in light of USF’s structural failures to support their reporting or their safety and wellbeing, is [REDACTED]. University leaders [REDACTED]—the clear result of an abusive culture fostered by the Coaches that had normalized their conduct over a twenty-year period with no meaningful oversight or adverse consequence.

38. In now pressing former players for declarations denying the Coaches’ misconduct, USF is continuing that very culture of coercion and abuse that its [REDACTED] [REDACTED] had created and perpetuated the problems on the baseball team to begin with.

VI. CONCLUSION

39. The additional evidence produced to date further supports my prior conclusions that USF has breached its responsibility to protect student-athletes, prioritizing institutional interests over the well-being and safety of its student-athletes. Perversely, in now pressing former players to deny the Coaches’ misconduct, USF is perpetuating the very problematic culture and approach that permitted the Coaches to abuse student-athletes unchecked for over twenty years.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: February 6, 2025

A handwritten signature in black ink, appearing to read "Robert A. Boland". The signature is written in a cursive, flowing style.

Robert A. Boland, J.D.

APPENDIX 3

ECF No. 279: Defendant Anthony “Nino” Giarratano’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 279-1: Declaration of Daniel A. Croley in Support of Defendant Giarratano’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 279-2: Declaration of Katherine O’Neal in Support of Defendant Giarratano’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 280: Defendant Troy Nakamura’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 280-1: Declaration of Scott Rapkin in Support of Troy Nakamura’s Opposition to Motion for Class Certification
ECF No. 280-2: Declaration of Troy Nakamura in Support of Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 282: Defendant USF’s Opposition to Plaintiffs’ Motion for Class Certification (redacted/unredacted)
ECF No. 282-1: Defendants’ Joint Compendium of Declarations in Support of Defendants’ Oppositions to Plaintiffs’ Motion for Class Certification
ECF No. 282-2: Declaration Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 284-3: Exhibit 1 to Declaration of Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 282-4: Exhibit 2 to Declaration of Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 282-5: Exhibit 3 to Declaration of Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 282-6: Exhibit 4 to Declaration of Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 284-4: Exhibit 5 to Declaration of Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification
ECF No. 284-5: Exhibit 6 to Declaration of Jonathan Baum in Support of USF’s Opposition to Plaintiffs’ Motion for Class Certification

ECF No. 282-9: Exhibit 7 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-6: Exhibit 8 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-7: Exhibit 9 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-8: Exhibit 10 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-9: Exhibit 11 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-10: Exhibit 12 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-11: Exhibit 13 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-3: Exhibit 14 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-4: Exhibit 15 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-5: Exhibit 16 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-12: Exhibit 17 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-13: Exhibit 18 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-14: Exhibit 19 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 282-22: Exhibit 20 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 282-23: Exhibit 21 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification

ECF No. 284-15: Exhibit 22 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-6: Exhibit 23 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-7: Exhibit 24 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-8: Exhibit 25 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-9: Exhibit 26 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-10: Exhibit 27 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-11: Exhibit 28 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-12: Exhibit 29 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 282-32: Exhibit 30 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 282-33: Exhibit 31 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 282-34: Exhibit 32 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-13: Exhibit 33 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-14: Exhibit 34 to Declaration of Jonathan Baum in Support of USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283: USF's Administrative Motion to Consider Whether Another Party's Material Should be Sealed Relating to USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-1: Declaration of Nicolena F. Farias-Eisner in Support of USF's Administrative Motion to Consider Whether

Another Party's Material Should be Sealed Relating to USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 283-2: [Proposed] Order Regarding USF's Administrative Motion to Consider Whether Another Party's Material Should be Sealed Relating to USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284: USF's Administrative Motion to File Under Seal Documents Relating to USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-1: Declaration of Nicolena F. Farias-Eisner in Support of USF's Administrative Motion to File Under Seal Documents Relating to USF's Opposition to Plaintiffs' Motion for Class Certification
ECF No. 284-2: [Proposed] Order Granting USF's Administrative Motion to File Under Seal Documents Relating to USF's Opposition to Plaintiffs' Motion for Class Certification
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USF_0115118
USF_0115154
USF_0115157
USF_0115174
USF_0115245
USF_0115264
USF_0115265
USF_0115267
USF_0115279
USF_0115281
USF_0115282
USF_0115285
USF_0115338
USF_0115357
USF_0115359
USF_0115365
USF_0115369
USF_0115379
USF_0115380
USF_0115384
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